

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TENNESSEE**

IN RE:)	
)	CASE NO. 19-30279-SHB
TIFFANY ATKINS SMITH,)	CHAPTER 7
)	JUDGE BAUKNIGHT
Debtor(s).)	

NOTICE OF OPPORTUNITY TO OBJECT AND FOR HEARING

Notice is hereby given that:

Pursuant to E.D. Tenn. LBR 9013-1(h), the court may consider this matter without further notice or hearing unless a party in interest files an objection. If you object to the relief requested in this paper, you must file with the clerk of court at U.S. Bankruptcy Court, Howard H. Baker, Jr. U.S. Courthouse, Suite 330, 800 Market Street, Knoxville, TN 37902, an objection within 21 days from the date this paper was filed and serve a copy on the movant's attorney, Kevin J. Jones, 1801 8th Ave. S., Ste. 100, Nashville, TN 37203. If you file and serve an objection within the time permitted, the court will schedule a hearing and you will be notified. If you do not file an objection within the time permitted, the court will consider that you do not oppose the granting of the relief requested in this paper and may grant the relief requested without further notice or hearing.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

MOTION TO EXTEND DEADLINE TO FILE REAFFIRMATION AGREEMENT

Republic Finance, hereby moves this court for an order extending this deadline within which to file a reaffirmation agreement for the following reasons set out and for the reasons;

1. The debtor initiated a voluntary petition under 02/01/2019.
2. The first date set for the meeting of creditors was 03/12/2019.
3. Pursuant to rule 4008, Fed Rules of Bankr. Procedure, reaffirmation agreements shall be filed no later than 60 days after the first date set for the meeting of creditors.
4. The parties are presently negotiating terms of a possible reaffirmation agreement and need additional time to finalize the terms.

5. Rule 4008, F.R.B.P., permits the Court, in its discretion, to enlarge the time to file a reaffirmation agreement.

WHEREFORE, premises considered the parties pray for an order from the Court extending the time within which a reaffirmation agreement may be filed for an additional thirty (30) days from May 13, 2019 for the reasons set forth hereinabove.

Respectfully submitted,

/s/ Kevin J. Jones

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been mailed to the following, on this the 13th day of May 2019.

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/s/ Kevin J. Jones

Kevin J. Jones